PUBLIC MEETING ON RISK-BASED PERFORMANCE INDICATOR WHITE PAPER

Summary of Comments Discussed at the Meeting

At the meeting on April 28, 2000, five specific questions were raised. The questions and the corresponding responses/comments are summarized below:

Question 1:
Are concepts in the RBPI white paper consistent with the philosophy and direction?

Comments:

1.   Some policy-related issues were raised by NEI as summarized below:

   - Current PIs monitor a sample of risk-significant areas. The RBPIs appear to be more of an attempt to directly measure risk.
   - The inclusion of RBPIs should result in reduction of inspection activities. In other words, there should be a balance between the performance measured by PIs and inspections.
   - The current Action Matrix will need to be changed to reflect the number of new PIs.

1.   The following comments were made by Public Citizen (PC):

   - The representative of PC strongly agrees with the ACRS position with respect to RBPIs.
   - Some of the technical areas such as development of RBPIs for shutdown and Fire may be problematical.
   - RBPIs should be presented in a way that ties them to events that drive them.
   - Don't use PIs as an excuse to reduce inspection hours. (PC)

Question 2:
Are RBPI characteristics appropriate?

Comments:

•   The peer review process for the SPAR models was not discussed in the RBPI white paper. There should be a commitment to peer review the SPAR models? (NEI)

•   One of the RBPI characteristics should be "Easy to understand and collect data". Another RBPI characteristic should be "Minimize potential for unintended consequences; e.g., causing the operator to take inappropriate action in order to avoid crossing a PI threshold". (NEI)

Question 3:
Are RBPI development steps appropriate?

Comments:

• The RBPI white paper should address the development of RBPIs with respect to model capability. It should also be noted that the involvement of Regions and their inputs are very critical. (PC)

• The Green/White threshold based on risk versus 95% concept should be explored. (NEI)

Question 4:
Are the proposed RBPI elements (data sources, RBPIs, industry trends) appropriate for RROP?

Comments:

• An appropriate Green/White threshold for the current RROP performance indicators should be developed. Enough cushion should be left to allow for planned maintenance to avoid unintended consequences. The target in this area ought to be consistent with other programs such as Maintenance Rule. (NEI)

• Validation of RBPIs is an important step of the development effort. (UCS)

Question 5:
Are proposed Phase-1 products appropriate?

Comment:

• An integrated indicator may not be appropriate. There is a problem with a single indicator of performance. (NEI)

Some of the comments were related to the RBPI process and general communication issues as summarized below:

Comments on Process Issues:

• RBPIs should not be limited to the scope of the RROP. The PIs should address activities in the following areas: (UCS)

  • Reactivity control
  • Decay heat control
  • Radioactive material control
  • Public and workers radiation exposure control

- One of the RBPI characteristics should be "RBPIs should cover all modes of plant <u>activities</u>". In addition, the 3rd bullet of RBPI Characteristics viewgraph (Within each mode, RBPIs should cover risk-important SSCs to the extent practical) should be eliminated. (UCS)

- RBPIs need to mesh with the existing PIs to provide stability for the process. (UCS)

- The time lag between the performance data collected and the availability of PI outputs should support the current RROP structure. (NRC/NRR)

- Licensees should own the data and/or performance indicators. (NRC/NRR)

Comments on General Communication Issues:

- The development of plant-specific thresholds should not create a perception that different plants have different levels of safety. (PC)

- Similar events at different plants that result in different risk classification will require explanation. (UCS)

- Rename RBPI to avoid the perception that there are risk-informed regulations and risk-based regulations, where, in fact, they are the same. (NRC/NRR)

- The relationship between risk-based PIs and risk-informed inspections should be explained. (NRC/NRR)

- The data should be made available to the public.